

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

DONAT RICKETTS

(b) County of Residence of First Listed Plaintiff FRANKLIN  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

In Pro Se

## DEFENDANTS

Adrian Deonte Lewis, Michael Braggs, JAcqueline Suzette Wright-Johnson, Does 1 through 10

County of Residence of First Listed Defendant Minnesota  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                                   | DEF                                   |
|---|---------------------------------------|---------------------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input checked="" type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5            | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6            | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
Section 2739.01 | Libel and slander.  
Brief description of cause:  
Conspiracy to violate rights, defame and substantially interfere with prospective economic advantages.

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 150,000 CHECK YES only if demanded in complaint: JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

05/22/2023

SIGNATURE OF ATTORNEY OF RECORD

Donat Ricketts

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
  - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

## UNITED STATES DISTRICT COURT

for the

SOUTHERN District of OHIO

SIXTH Division

Case No.

**2:23-CV-1711**

(to be filled in by the Clerk's Office)

DONAT RICKETTS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

*DR*

LEWIS

ADRIAN DEONTE ~~SMITH~~, MICHAEL BRAGGS,  
JACQUELINE SUZETTE WRIGHT-JOHNSON, and  
DOES 1 to 10

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

*DR*DEMAND FOR  
JURY TRIAL

Judge: Morrison

Magistrate Judge: Jolson

## AMENDED COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	DONAT RICKETTS
Street Address	426 S. Oakley Ave.
City and County	Columbus, Franklin County
State and Zip Code	Ohio, 43204
Telephone Number	318-497-5075
E-mail Address	donatricketts2@icloud.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

	LEWIS <i>DR</i>
Name	ADRIAN DEONTE <del>SMITH</del>
Job or Title <i>(if known)</i>	SOCIAL MEDIA PERSONALITY
Street Address	228 E. FRONT STREET
City and County	CLAREMONT
State and Zip Code	MINNESOTA
Telephone Number	UNKNOWN
E-mail Address <i>(if known)</i>	UNKNOWN

## Defendant No. 2

Name	MICHEAL BRAGGS
Job or Title <i>(if known)</i>	YOUTUBE CREATOR
Street Address	529 Eleni Lane
City and County	Manteca, San Joaquin
State and Zip Code	California 95336
Telephone Number	(209) 276-5237
E-mail Address <i>(if known)</i>	MBRAGGS88@GMAIL.COM

## Defendant No. 3

Name	JACQUELINE SUZETTE WRIGHT-JOHNSON
Job or Title <i>(if known)</i>	C/O DALLAS COUNTY DENTENTION CENTER
Street Address	2600 Lone Star Dr.
City and County	Dallas, Dallas County
State and Zip Code	Texas, 75212
Telephone Number	UNKNOWN
E-mail Address <i>(if known)</i>	UNKOWN

## Defendant No. 4

Name	DOES 1 thru 10
Job or Title <i>(if known)</i>	YOUTUBE CREATORS
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

17 U.S. Code §512(f) misrepresentation of materials online; 18 U.S. Code §1621 perjury; and 42 U.S.C. 1985 - Conspiracy to interfere with civil rights

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* DONAT RICKETTS, is a citizen of the State of *(name)* OHIO.

## b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

LEWIS <sup>DR</sup>  
The defendant, *(name)* ADRIAN DEONTE ~~XXXXX~~, is a citizen of the State of *(name)* MINNESOTA. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_, and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$150,000 - Claim I: 17 U.S. Code §512(f) misrepresentation of materials online; Claim II: 18 U.S. Code §1621 perjury; Claim III: 42 U.S.C. 1985 - Conspiracy to interfere with civil rights; Claim IV: Ohio State Section 2739.01 Libel, slander and defamation; Claim V: Ohio State - Tortious Interference With Prospective Economic Advantages; Claim VI: Ohio State - Intention Infliction of Emotional Distress; and Claim VII: Ohio State - Section 2903.211 | Menacing by stalking.

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

## A. Where did the events giving rise to your claim(s) occur?

Multiple states to 50,000 people via social media applications like Patreon, StationHead and Google, LLC dba YouTube

## B. What date and approximate time did the events giving rise to your claim(s) occur?

March 21<sup>st</sup>, 2023 and ongoing.

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Claim I: 17 U.S. Code §512(f) misrepresentation of materials online; Claim II: 18 U.S. Code §1621 perjury; Claim III: 42 U.S.C. 1985 - Conspiracy to interfere with civil rights; Claim IV: Ohio State Section 2739.01 Libel, slander and defamation; Claim V: Ohio State - Tortious Interference With Prospective Economic Advantages; Claim VI: Ohio State - Intention Infliction of Emotional Distress; and Claim VII: Ohio State - Section 2903.211 | Menacing by stalking.

Plaintiff, DONAT is an accredited actor, Producer, Independent journalist and YouTube Creator who uses parody and wit to educate, entertain and teach people about critical thinking.

#### SHORT STATEMENT

The Co-Conspirators claimed falsely that:

1. Claims I have HIV/AIDS via Patreon App, StationHead App, and YouTube to THOUSANDS;
  2. Claims I openly admitted to having HIV/AIDS, Herpes and Syphilis;
  3. Claims I have CMT, a complication related to HIV/AIDS;
  4. Claims I am not an accredited actor;
  5. Claims I collected money from clients while misrepresenting myself as a licensed attorney;
  6. Claims I stole copyright materials which hinder my business for 21 days;
  7. Claims I defrauded my youtube fans with fake life stories;
- and more!

These are obvious lies that have easily been debunked by public record (before the conspirator's allegations) and medical records. The Defendants claimed they said these things AND KNEW they were false, intrinsically challenging me to sue them. Additionally, they conspired to commit perjury with false copyright claims as a means to eliminate me as a righteous opponent which injured me financially.

(See Attachment for more details)

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#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Plaintiff and the Defendants are contracted with Google dba YouTube Content Creators' Program. Earnings are greatly based upon topics and reputation; which has been tarnished. The Defendants' acts have caused me severe emotional distress, subscribers, and thus Ad-Revenue and Fan Funding in an amount that can be calculated during trial, based on earned revenue previous to March 21<sup>st</sup>, 2023 in comparison to after their torturios acts.

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**SECTION 1(B)**

**DEFENDANTS**

- 2. Michael Braggs State of California**
- 3. Jacqueline Suzette Johnson state of Texas**
- 4. Does 1 thru 10 (pending names and location)**

**SECTION III(C)**

**ADDITIONAL FACTS**

Plaintiff is every bit the man he claims to be, flaws and all. I'm a guy who came up from the streets of Florida to become an entertainer and truth seeker. I tell it like it is. My livelihood, therefore, depends on my reputation.

LEWIS *DR*

In January 2023, I personally reached out to Adrian Deonte ~~Smith~~ aka Sean Davie Way (from hereon "Smith") and Michael Braggs aka Official King Pain (from herein "Braggs") regarding cross-promotion and possible collaboration(s). **Both expressed a desire to use my looks and intellect to grow their own platforms.** On February 3rd, 2023, Defendant Smith was sent a screenshot of me on Braggs' platform in which he replied **"You go on my friend show before mine. Hmm..."** Now, Braggs is the founder of a supplemental platform called 'The Lituation' while Smiths' panelist platform has yet to be launched because **he planned on using me as the face/voice.**

LEWIS *DR*

**Adrian Deonte ~~Smith~~ (excluding Claims I-II)**

After speaking 45 minutes via Instagram phone, Mr. Smith sent me a long message which reads:

**"So I've been watching your content and I must say I like you. You are handsome, smart and actually think before you speak. Great qualities but I did some research and I hear some things about you that aren't the greatest. Some peeps I reached out to about you said you just want to use me clout chase etc. I'm not saying it's true because you seem like a great guy but I can rule it out. I want to genuinely work with people. I'm thinking of creating a panel and wanted you to be first up. I am concerned about you now so I dunno. I hope you can clarify and we can work together. You make me nervous but I hope you're having a goodnight. Later man."**

LEWIS *DR*

I immediately phoned Mr. ~~Smith~~ and demanded that he disclose said information from his investigation and allegations. Mr. ~~Smith~~ refused to communicate such findings; I suspected he possessed content, false narratives and defaming information that would damage my reputation. (See <https://www.ripoffreport.com/report/clubhouse/san-fransisco-california-paul-1520335>.)



### **Michael Braggs ALL Claims**

Mr. Braggs feels as if I owe him my entire YouTube career. In February 2023, he conducted an interview with a grown man that accused another YouTuber of sexual assault. Without victim shaming I had questions; because I felt there were holes in the story. Because Mr. Braggs had already built an audience covering the story there was already a collective echo chamber created in opposition to said abuser. So, the audience turned against me and began slandering me all over YouTube. This allowed Mr. Braggs to strategically use me as content, which in terms became beneficial to me as I was ALREADY known as a content creator.

Around late February 2023, Mr. Braggs closed his YouTube livestream which had more than 400 in attendance, he then invited me to his Instagram live where we discussed possibly meeting in Los Angeles. During this Instagram meeting a known harasser began to sexually harass me. Mr. Braggs was solely responsible for the said behavior as it was his Instagram, and he had a duty/responsibility to cease the criminal activity. Because he refused to check it, I left Instagram and blocked all parties involved across all social media platforms.

*D.R.*

LEWIS

~~Smith~~

In early March 2023, Mr. ~~Smith~~, Mr. Braggs and Defendant Jacqueline Suzette Wright-Johnson (from herein "Mrs. Johnson") co-conspired to defraud their YouTube subscribers to gain money to human traffic a mentally ill woman from Detroit, MI to Dexto, TX to exploit her false claims of being the biological daughter of global superstars Aaliyah and R. Kelly. (See <https://www.htlegalcenter.org/wp-content/uploads/Trafficking-of-Persons-with-Disabilities-in-the-United-States-Fact-Sheet.pdf>.) I was the only content creator brave enough to challenge their malfeasance and smart enough to articulate their actions according to criminal law.

### **Jacqueline Wright-Johnson ALL Claims**

Mrs. Wright-Johnson not only human trafficked a mentally disabled woman, but she also exploited her husband, a mentally/emotionally unstable veteran. Gerald Johnson aka Goomba and his family were exploited by her gang of queers. After witnessing this I carved a niche for myself by donating more than \$1,500.00 to Goomba in exchange for exclusive appearances on my platform with the hopes that Jaguar Wright would also join. My initial intent was to reverse false narratives and cease endless drama, which was created by Sean Davie Way and Official King Pain. Instead, Jaguar Wright-Johnson has been continuously exploited, even while she's incarcerated and the three collectively formed a conspiracy against my rights.

### **The Conspiracy (AGAINST ALL DEFENDANTS)**

It was public knowledge that I would embark on a multi-state vacation. Upon information and belief, the co-conspirators took a mental note of said date(s) and planned to launch an attack on my character and platform. On March 23rd, 2023, while at the airport I was notified that Sean Davie Way, Official King Pain and Jagaur Wright-Johnson began using Patreon App, StationHead App and YouTube to defame my character with false narratives, specifically claiming they know for a FACT that I have HIV/AIDS and other

generous statements. The said behaviors caused at least 15 content creators to create spin-off narratives, regurgitating said defamation to at least 50,000 people collectively.

Jaguar Wright-Johnson told her following of 24.4k subscribers that I have HIV/AIDS while referring to me as "DonAids". Official King Pain with 20.9k subscribers not only reposted the defaming content on his Patreon, but he repeated it in at least 15 YouTube videos. Defendant Adrian continued to defame Plaintiff, as late as May 22<sup>nd</sup>, 2023.

Mr. Braggs and Mrs. Wright-Johnson abused YouTube and the DCMA copyright strike system by filing a total of 19 false copyright strikes against my platform as a way to silence me while entertaining THOUSANDS with a false narrative that I have HIV/AIDS. Additionally, because of the co-conspirators' acts, I was unable to access my YouTube platform for 21 days. I lost momentum and at least \$4,000.00 in expected ad revenue and fan funding during that time, because I had EXCLUSIVE interviews planned around the hottest narratives in this particular sector of YouTube. The co-conspirators planned to break up my monopoly and have me banned from YouTube.

Mr. Braggs was warned by Plaintiff via email that his copyright claims were false and that the Federal Courts would via his lawsuit as frivolous as he doesn't own a valid copyright registration. Further, YouTube sent Mr. Braggs notification that they planned to reverse all 19 false copyright strikes against me if Mr. Braggs did not pursue legal actions against me within 10 days. Mr. Braggs electronically filed a Small Claims Action in state court, hoping to get another case sent to Judge Mathis.

(See [https://www.youtube.com/watch?v=4mX\\_d81w0Ss](https://www.youtube.com/watch?v=4mX_d81w0Ss).)

However, because copyright is a federal law Mr. Braggs filed a federal lawsuit against me for criminal copyright infringement on a Fee Waiver, which was denied. Mr. Braggs also failed to pay court fees in a timely fashion, therefore the Federal District Court will toss the lawsuit any day now. Moreover, YouTube did in fact reverse all 19 copyright strikes while informing both myself and Mr. Braggs that one of our platforms will be deleted given a Final Judgement in the copyright lawsuit.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff uses Youtube for entertainment purposes, to practice improv comedy and to get comfortable in front of the camera. Defendants, on the other hand, have been on YouTube for more than 10 years collectively with no reputation to protect and little to lose by defaming a man who does. The conspirators are social media BULLIES best known for a series of dubious online adventures—from conspiracy theories about celebrities—and, most recently, exploitation/oversaturation of Jaguar Wright to claim dominance in small YouTube sectors. I am a vocal skeptic of, and perhaps also a reminder of everything the co-conspirators are not in terms of character, hard work, and personal achievement. Defendants have caused Plaintiff more than \$5,000.00 in actual damages (and counting). In today's world Social Media can either build or destroy REAL LIFE opportunities. The Defendants owe Plaintiff actual, punitive and exemplary damages in an amount that should be determined at trial.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/22/2023

Signature of Plaintiff

*Donat Ricketts*

Printed Name of Plaintiff

DONAT RICKETTS, IN PRO SE

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

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Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address